

***United States Court of Appeals
for the Second Circuit***



**APPELLANT'S
REPLY BRIEF**

77-1085

United States Court of Appeals ^B

FOR THE SECOND CIRCUIT

Docket No. 77-1085

UNITED STATES OF AMERICA,

Appellee,

—vs.—

SEBASTIAN INTERSIMONE,

Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

REPLY BRIEF AND SUPPLEMENTAL APPENDIX
FOR APPELLANT

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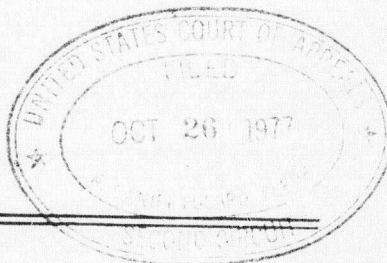


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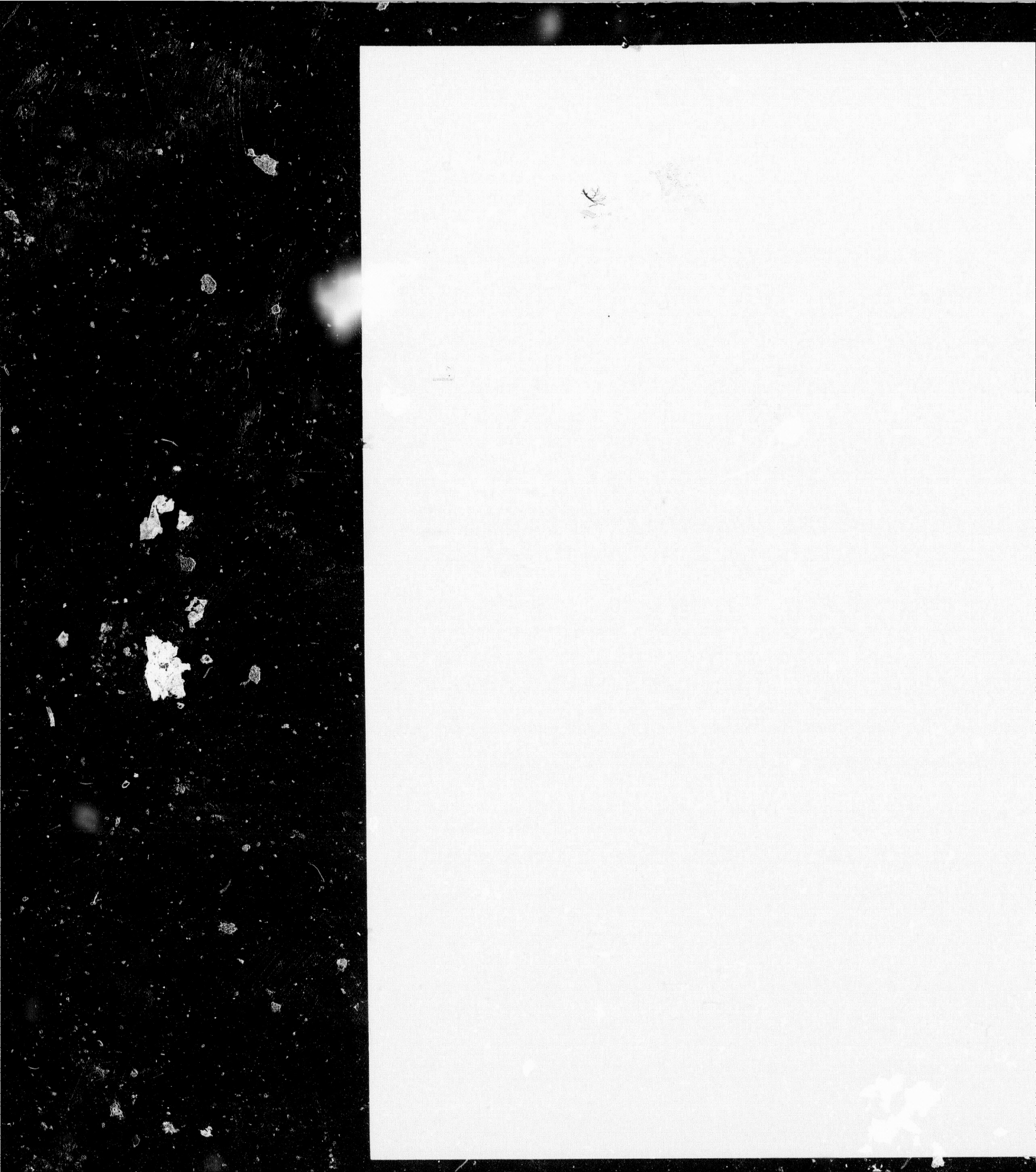
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**United States Court of Appeals
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Docket No. 77-1085

UNITED STATES OF AMERICA,

Appellee,

—vs.—

SEBASTIAN INTERSIMONE,

Appellant.

REPLY BRIEF FOR APPELLANT

Preliminary Statement

This Brief is submitted on behalf of Appellant Sebastian Intersimone in reply to specific arguments and statements made in the Brief of Appellee which was received on September 21, 1977.¹ Failure to reply to a

¹ We note with particularity that the government in its brief makes numerous references to its related brief which was filed earlier in the appeal of thirteen appellants, *United States v. Moten, et al.*, which was decided in this Court on September 6, 1977. In addition, the government also makes reference to this Court's *Moten* opinion, together with a reference to material contained in the appendix which was filed by the appellants in *Moien*. When serving us with the brief of the appellee, the government failed to enclose any of the previously mentioned related material. Therefore, the failure of the government to furnish the related material has caused much hardship and a delay in valuable time upon the appellant Intersimone, as we have been forced to secure the related material from other sources. We respectfully trust that this Court will take judicial notice of this apparent lack of concern displayed by the government.

particular matter in the government's brief means only that the matter has been sufficiently addressed in Intersimone's main brief; that it is insignificant with respect to the disposition of this case; or, that the matter will be sufficiently addressed in oral argument before this Court.

Included in this brief is a supplemental appendix.

ARGUMENT

POINT I

The Jury Improperly Found a "Single Conspiracy" among Intersimone and other Defendants and co-conspirators to traffic in Heroin and Cocaine, and the Evidence in no way Supported the Jury's Finding of Intersimone's Membership in the Overall Conspiracy; Intersimone was Entitled to a Severance Based upon Severe Prejudice.

1. Single or Multiple Conspiracies

The government, in its brief, states, "The identical issue [proof at trial disclosed multiple conspiracies] was raised in the related appeals by Intersimone's co-defendants and this Court rejected that contention that 'there was sufficient evidence to permit the jury to find the single conspiracy alleged.'" *United States v. Moten, et al.*, — F.2d —, Docket Nos. 77-1085-1094 (2d Cir. September 6, 1977), slip op. 5769. We agree with the *Moten* Court that in the cases of the cases of the twelve distributor-appellants and the one coreman then before it, there was sufficient evidence *as to those appellants* that they all participated in the overall conspiracy alleged by the government to distribute both cocaine and heroin; *however*, we disagree with the government's preposterous

statement that Intersimone here raises the identical issue of the other appellants.

The facts of the case, *in relation to Intersimone*, clearly show that he was a distinct and separate entity in relation to the overall conspiracy charged and was connected to it only by his mere association with one of its active participants, unindicted co-conspirator, John T. Brown, the key government witness at trial. Even assuming, *arguendo*, that Intersimone took part in a conspiracy, the facts would tend to show his participation in a *heroin conspiracy* in combination with Brown and the people to whom Brown sold the heroin.

We respectfully submit that the evidence below established at least two, distinct conspiracies, if any: a *cocaine conspiracy* led by Juan Antonio Alvarez, and a *heroin conspiracy* led by John Capra, Leoluca Guarino, and Steven Dellacava (Capra Trio) who were all severed pre-trial, thus leaving Intersimone the only supplier of heroin for purposes of the trial below. Moreover, the evidence produced nothing to show that the two chains were connected in the slightest degree with the exception that both chains dealt with the same party, John T. Brown.

A. Suppliers

As discussed *supra*, the proof at trial disclosed two distinct and separate conspiracies, *i.e.*, the cocaine conspiracy and the heroin conspiracy. These two separate chains of suppliers are depicted on the government's organizational chart (Gov't. Br. p. 5) with the cocaine suppliers on the right and the heroin suppliers on the left. Obviously, both chains run *parallel*. The record shows that the government has conceded that there were *two* completely separate chains of supply (Tr. 7297-8).

At this juncture, there is no evidence that the one on the right knows that the one on the left exists. Significant to this point is the fact that members of the cocaine suppliers who testified for the government at trial, Jose Luis Sureda and the Yaujar brothers, Eduardo and Lazaro, disclosed no knowledge whatsoever of the existence of the heroin chain of suppliers mentioned in Count One of the indictment.

B. Core or Middlemen

The trial evidence further disclosed that the cocaine chain of suppliers and the heroin chain of suppliers never sold their respective narcotic to each other but, instead, sold to the same key government witness, John T. Brown, in separate, unrelated, and independent business transactions.² A significant fact here remains that during the entire 7½ year period of the government's alleged "single conspiracy," no proof was shown that could support a claim or inference that there was either a mutual dependence or agreement reached among the two separate chains of suppliers. All that is shown is two separate conspiracies with a "link" in the middle, thereby joining the two in a "hub" from which all defendants radiated.

C. Distributors

We now reach the level of participants alleged by the government in its "single conspiracy" which was primarily discussed by this Court in *United States v. Moten, supra*,

² Brown had two associates in his level of operation (middlemen) who he depended upon to either assist him in financing his countless drug transactions (Frank Moten), or to assist him in the role of courier or deliverer of money and narcotics (Michael Parker).

wherein the Court affirmed the convictions of twelve³ distributor-appellants⁴ and one core middleman.⁵

For the sake of brevity, we shall only deal here with those distributor-appellants who perfected their appeals. Nine of the twelve distributor-appellants—Schennault, Hightower, Foster, Joseph and Lois Sampson, Cowpers, Morris, Davis, and Bonilla—purchased both heroin and cocaine from the core of middlemen.⁶ The three remaining distributor-appellants, Wilson, Laws, and Mitchell dealt in cocaine only. The relationships here were neither casual nor spasmodic and no distributor-appellant was involved in a single sale.⁷ Moreover, this Court found in *Moten, supra*, the relationships between the core of middlemen and the distributor-appellants constituted the "single conspiracy" as that conspiracy *actually charged* in Count One of the indictment.

* * * * *

Therefore, as pointed out by Intersimone in his principal brief (pgs. 23-24), and totally ignored by the government, the ruling held in *United States Bertolotti*, 529 F.2d 149, 154 (2d Cir. 1975), is applicable here:

³ Thirteen defendants perfected their appeals. Angel Rodriguez, who died while he was confined in the U. S. Penitentiary, Atlanta, Georgia, during the pendency of his appeal, was the *only* appellant who could have laid claim to the same argument of multiple conspiracies now presented by Intersimone, *i.e.*, Rodriguez was only involved in one of the conspiracies proven at trial.

⁴ William Hightower, Sidney Foster, Joseph Sampson, Lois Sampson, Yvonne Schennault, Don Wilson, James Laws, Tommy Davis, John Morris, Lawrence Mitchell, Raphael Bonilla, and Charles Cowpers.

⁵ Frank Moten.

⁶ According to the record, *none* of the twelve distributor-appellants either knew or had knowledge of Intersimone.

⁷ Page 6 in the *Moten* Opinion.

"When convictions have been obtained on the theory that *all* defendants were members of a[n] [overall] conspiracy, although the proof disclosed multiple conspiracies, the error of variance has been committed. *Berger v. United States*, 295 U.S. 78 (1935); *Koteakos v. United States*, 328 U.S. 750 (1946)." (Emphasis supplied).

The reliance by the government that Intersimone was a member of the overall conspiracy as charged in the indictment, in light of the above, is both factually and legally erroneous.

2. Insufficient Evidence

The government, in its brief, claims, "that the record shows not a single but repeated conspiratorial acts by Intersimone" in furtherance of the alleged conspiracy: his advice and counseling to Brown; his willingness to "reach out" to Brown to obtain a kilogram of heroin on short notice in 1969; his sale of four kilograms of "pure" heroin in the Fall of 1971; his use of the conspiratorial "banking" facilities to launder \$20,000 of drug profits in April, 1972; and, his conversation with Brown in March, 1975. The government further argues that, "In addition, the background information [prior similar acts] relating to Intersimone's sales of kilogram quantities of heroin to Brown in 1959 and 1965 and his knowledge of Brown's incarceration for conspiracy to sell narcotics in 1960, strongly supported the conclusion that he had knowledge of the broader conspiracy" (Gov't. Br. 21).

We have carefully searched the record to confirm the government's argument that the background information [prior similar acts] introduced against Intersimone at trial supported the *conclusion* that he had knowledge of the broader conspiracy and are unable to find a scintilla of proof to the government's misrepresented claim. In

fact, the *record* (Tr. 9434) clearly shows that the jury's verdict found Intersimone guilty of joining the alleged conspiracy *after* May 1, 1971. Thus, the jury must have unequivocally *rejected* the government's so-called "background information" introduced against Intersimone at trial. Therefore, the first two "acts" as enumerated by the government must be discarded, *i.e.*, Intersimone's advice and counseling to Brown and his willingness to "reach out" for Brown for heroin in 1969.

The three remaining "acts" alleged by the government to have been committed by Intersimone in furtherance of the conspiracy warrant the following discussion in their ascending order:

Intersimone's conversation with Brown in March, 1975

The jury could readily conclude that there was a reasonable doubt that the statement attributed to Intersimone in this alleged telephone call that "if [Brown] had called earlier [Intersimone], would have *had* good news for [him]," was (a) in fact ever made; (b) referred to narcotics; or, (c) was an overt act, since the statement of what *might have been made* if Brown had called earlier.⁸ Therefore, this "act" allegedly made in furtherance of the overall conspiracy must also be discarded.

Intersimone's Use of the Conspiratorial "banking" facilities to launder \$20,000 of drug profits in April, 1972

⁸ At trial, the government also introduced evidence to show that several telephone calls had been made between Brown and Intersimone in 1974, and that one telephone call had been made between Intersimone and Moten; however, this "evidence" was only in the form of telephone toll slips showing that calls had been made from one *number* to another. No evidence was introduced as to the substance of *any* of these alleged calls, and no evidence was introduced that the alleged parties, Intersimone, Brown, and Moten were the actual parties making the calls.

The government's claim, in its brief, that Intersimone made use of Moten's financial expertise and assistance to the conspiracy by "laundering" \$20,000 is sheer fabrication. The record shows quite the contrary: Intersimone asked *Brown* sometime in 1971 if Brown could "legalize" some uncertain amount of money for him (Tr. 1265) (A 239). Some *months* later in 1972, *Brown* asked Moten if he would arrange a loan to him (Brown), to which Moten agreed (Tr. 1266) (A 240). Brown then called Intersimone and told him that *he* (Brown) could handle the money transaction. Intersimone then instructed Brown *not to give up any money* until he was sure it was on the up-and-up (Tr. 1267) (A 241). Brown then secured \$20,000 of *his own money* and then accompanied Moten to Boston where Moten allegedly met with one Peter Fiumara who issued a \$20,000 check made payable to Sebastian Intersimone (Tr. 1267) (A 241). The record further shows that *Brown*, "got, kept the check and eventually I gave it back to Benry and he gave *me* the money" (Tr. 1268) (A 242). A copy of this check (GX 42) appears in the supplemental appendix to this brief.

This "laundering" transaction could hardly be attributed to any "mutual dependence and assistance" on the part of Intersimone with the "banking" facilities of the conspiracy. In fact, Intersimone's instruction to Brown to *make sure not to give up any money* until Brown was *sure* that everything was "on the up and up" shows a clear *mistrust* of Intersimone in relation to Moten and the alleged conspiratorial enterprise. Therefore, the government's reliance upon *United States v. Tramunti*, 513 F.2d 1087, 1106 (2d Cir.), *cert. denied*, 423 U.S. 832 (1975) to show "mutual dependence and assistance" is sorely misplaced in view of the hard facts. Thus, this "act" claimed by the government to show a furtherance of the alleged conspiracy must, too, be discarded.

Thus, the last "act" remaining of Intersimone's alleged involvement in the overall charged conspiracy is

his *single sale* of heroin in the Fall of 1970 or 1971. We have previously argued in Intersimone's principal brief (pgs. 37-40) that the government did not present sufficient evidence upon which a jury might find him guilty of this "single sale" beyond a reasonable doubt and, therefore, stand here upon that argument. In addition, we find that when we compare Intersimone's alleged involvement in the overall conspiracy in relation to the other "suppliers" of heroin who were all severed pre-trial, John Capra, Leoluca Guarino, and Steven Dellacava, and who supplied Brown with amounts of heroin varying from half-kilograms to three kilograms once or twice each month for a period of *three consecutive years*, Intersimone's "role," viewed in the entire context of the conspiracy, declares his "act" as being miniscule. *United States v. Tramunti*, 513 F.2d 1087, 1112 (2d Cir.), *cert. denied*, 423 U.S. 832 (1975). Therefore, we think he is entitled to the benefit of the single act line of cases led by *United States v. Reina*, 242 F.2d 302, 306 (2d Cir.), *cert. denied*, 354 U.S. 913 (1957); *United States v. Aviles*, 274 F.2d 179, 189 (2d Cir.), *cert. denied*, 362 U.S. 974 (1960); *United States v. DeNoia*, 451 F.2d 979, 981 (2d Cir. 1971). This "act" by Intersimone, if it did, indeed, occur, was his *only* transaction with the group; under the reasoning of the *Reina* case, *supra*, the evidence is insufficient to support the inference that Intersimone knew or accepted the conspiratorial aims or that his participation went beyond the single transaction. *United States v. Stromberg*, 268 F.2d 256, 267 (2d Cir. 1959).

Applying the language of this Court in *United States v. Rosenblatt*, — F.2d —, Docket No. 76-1443 (2d Cir. April 19, 1977), slip op. 3031, that "[p]roof of the essential nature of the plan is *required* because 'gist of the offense remains the *agreement* and it is therefore *essential* to determine what kind of agreement or understanding existed as to each defendant.'" *United States v. Borelli*, 336 F.2d 376, 384 (2d Cir. 1964), *cert. denied*,

379 U.S. 960 (1965),”⁹ to the case now before the Court, it is readily apparent that the government has not proven Intersimone’s participation in the overall conspiracy. He knew nothing of Brown’s dealings in cocaine which formed, by far, the major activity of the overall conspiracy from 1969 on, and he knew nothing of Brown’s involvement with Capra, Guarino, and Dellacava, Brown’s only other source of “pure” heroin from 1970 on. Viewed

⁹ In light of the jury’s finding that Intersimone joined the overall conspiracy charged *after* May 1, 1971, the government’s position that Brown’s testimony in connection with his early dealings with Intersimone was received *solely* on the conspiracy charge (Gov’t. Br. 22) is misplaced. The trouble is that while such evidence is probative, it is highly prejudicial and a court or jury, as here, may find itself determining in general whether the defendant is a bad man rather than whether he committed a particular crime. *United States v. Stirone*, 262 F.2d 571, 576 (3rd Cir.), *reversed on other grounds*, 361 U.S. 212 (1960); *See also, United States v. Byrd*, 352 F.2d 570 (2d Cir. 1965).

The *Moten* Court (Slip op. at 5782) as well as the government in its brief (Gov’t. Br. 2), has made much ado over a belief that the jury was sufficiently competent to weigh the evidence and to make a determination as to the guilt or innocence as to each of the twenty-two defendants on trial on an individual basis. We respectfully urge this Court to re-examine this shared belief, as we believe it needs reconsideration in view of the evidence and verdict as to Intersimone. As conceded by the government in its brief, the alleged four-kilogram sale made by Intersimone was a *pivotal* act in terms of his *culpability* for the crimes charged in the indictment. In view of the fact that the jury *rejected* Brown’s prior similar acts testimony which was introduced *solely* to show intent or motive as to the conspiracy count, we submit that Brown’s highly prejudicial testimony made the jury conclude that Intersimone was guilty of the substantive count *first*, and then by a *prejudicial inference*, found him guilty of the conspiracy count as well. Thus, evidence admissible to prove only the conspiracy was improperly employed to prove the substantive count. *United States v. Agueci*, 310 F.2d 817 (2d Cir. 1962), *cert. denied*, 372 U.S. 959 (1963).

A copy of the jury’s actual verdict rendered as to the conspiracy was improperly employed to prove the substantive count.

in that light, the evidence proves that Intersimone was not a participant in the overall conspiracy but, rather, "an independent peddler of narcotics" as the Court found Valachi to be in *United States v. Reina, supra*, at 306; *Moccio v. United States*, 354 U.S. 913 (1957). Thus, the necessary requirements to prove one's participation in a conspiracy (the unlawful agreement and an overt act committed in furtherance of the conspiracy) were not met here. *United States v. Agueci*, 310 F.2d 817 (2d Cir. 1962), *cert. denied*, 372 U.S. 959 (1963); *United States v. Araujo*, 539 F.2d 287 (2d Cir. 1976). In further support to this, we respectfully refer the Members of this Court to pages 20-21 of Intersimone's principal brief.

3. Severance

Since the government, in its brief, refuses to acknowledge the fact that Intersimone was severely prejudiced by the "spillover" evidence introduced at trial to prove the cocaine conspiracy, we respectfully submit the following:

- A. *Twenty-four* of the thirty counts charged in the indictment relate *solely* to transactions in cocaine;¹⁰
- B. *Four* of the thirty counts charged in the indictment relate *solely* to transactions in heroin;¹¹
- C. *Two* of the thirty counts charged in the indictment relate *solely* to transactions in *both* heroin and cocaine.¹²

¹⁰ The Cocaine Conspiracy moved to Miami, Florida, in the Fall of 1973, and because of the jurisdiction further substantive counts in the indictment were precluded even though Overt Acts 35 through 46 refer to transactions of cocaine alleged to have occurred in Miami.

¹¹ Upon the arrest of severed co-defendant-suppliers Capra, Guarino, and Dellacava in April, 1973, the input of heroin into the charged overall conspiracy ceased.

¹² Count 1—Conspiracy; Count 17.

The evidence introduced by the Government to prove its massive *cocaine* conspiracy in the trial held below (15 out of the 22 defendants on trial), so overshadowed Intersimone's minute personal association with the chief government witness, John T. Brown, that he was swept away into the mass of confusion. Therefore, Intersimone was denied a fair trial.

We respectfully call the Court's attention to the fact that out of thirty-five witnesses called to testify for the government, only *two* gave testimony specifically relating to Intersimone. Of this testimony, only 60 pages were adduced to Intersimone out of a 9,500 page trial transcript.

Intersimone's convictions should be reversed because of the inherent unfairness of subjecting him to be joined with twenty-one other defendants to a massive trial lasting fourteen weeks. As was shown, *supra*, it was virtually impossible, *as to the case offered by the government against Intersimone*, to expect the jury to recognize the limitations of evidence to certain defendants over such a long and tedious period of time. In *United States v. Sperling*, 506 F.2d 1323 (2d Cir. 1974), *cert. denied*, 420 U.S. 962 (1975), this Court, while affirming the convictions of the defendants, cautioned the government that it *might* be unnecessarily exposing itself to reversal by *combining* a dozen or more defendants in a single trial on the theory of a single conspiracy when the acts could be more reasonably perceived as multiple conspiracies as here. *Id.* at 1340-41. That warning was repeated in *United States v. Miley*, 513 F.2d 1191 (2d Cir.), *cert. denied*, 423 U.S. 842 (1975) and *United States v. Bertolotti*, 529 F.2d 149 (2d Cir. 1975), although in both cases, the Court found that multiple conspiracies did exist.

In the instant case, the government argues that the defendants were joined together because of conservation

of judicial energy and the expense that would be required for separate trials. This argument was rejected by this Court in *United States v. Moten, supra*.

Therefore, in light of the facts as they specifically relate to *Intersimone*, failure of the trial court to sever him from the massive trial below was an abuse of discretion which prejudiced his right to a fair trial. *United States v. DeSapio*, 435 F.2d 272, 280 (2d Cir. 1970), cert. denied, 402 U.S. 999 (1971). The facts of *Intersimone's* case conclusively show that evidence introduced to prove one overall conspiracy spilled over and tainted the case on other counts in the indictment. As a result of this, we believe the jury intertwined the evidence, thereby lessening *Intersimone's* prospects of being acquitted as to Count One.

When unrelated transactions involving several defendants are joined together, "[i]t cannot be said . . . that all the defendants [would not be] . . . embarrassed and prejudiced in their defense, or that the attention of the jury may not have been distracted to their injury in passing upon the distinct and independent transactions." *United States v. Bova*, 493 F.2d 33, 36 (5th Cir. 1974), quoting *McElroy v. United States*, 164 U.S. 76, 81 (1896). Especially, when, as here, the nexus between the separate conspiracies is the defendants common to each and a mutual identity of the counts charged, the transference of guilt from one group of defendants to the other is inexorable. The result is an inherent prejudice that no form of limiting instructions or cautionary charge could absolve, and joinder of the conspiracies would be improper. Indeed, the government has not attempted to establish that a bridge sufficient to satisfy Rule 8(b) joinder between the defendants who went to trial as the result of these three conspiracies.

Rather, in the case *sub judice*, the government relies on Count One, containing a ubiquitous conspiracy charge,

to provide a common link between the otherwise unrelated transactions and to demonstrate a common scheme or plan among the twenty-two defendants. See *United States v. Banks*, 465 F.2d 1235, 1242-43 (5th Cir.), cert. denied, 409 U.S. 1062 (1972). The wording of Count One is apt to describe a "wheel conspiracy" in which Brown, the chief government witness, at the hub of the wheel might have conspired with others representing different spokes, in separate transactions to commit the substantive obscenity offenses charged. *United States v. Levine*, — F.2d — (5th Cir. February 7, 1977), Docket No. 76-1543.

We respectfully submit that if the indictment is read in a common sense fashion, it is clear that no agreement or conspiracy among the cocaine chain and the heroin chain ever existed. Count One of the indictment intended to and does allege facts which, in law, comprise at least two different conspiracies involving two completely unconnected transactions and that this total separation is confirmed by the substantive counts charged. In replying to Intersimone's argument, the government takes the preposterous position that the sole requirement is that the substantive offenses alleged in the indictment fall within the scope of the overall conspiracy. It takes this position even while admitting that no documentary or direct evidence ever existed to show that Intersimone had any dealings whatsoever in cocaine, or knew the existence of the separate chain of cocaine suppliers.

Indeed, upon comparing the conspiracy count and its overt acts with the substantive counts, one can only conclude that the insertion of Intersimone's name in connection with those defendants dealing exclusively in cocaine was the result of inadvertence on the government's part. Nothing is contained in the evidence from which one could reasonably conclude that Intersimone was connected with the cocaine defendants in any way. Therefore, we

respectfully submit that Intersimone's motions for severance should have been granted, and that by denying severance, the trial court committed reversible error which caused severe prejudice to appellant.

POINT II

Appellant Was Denied a Fair Trial as a Result of a Conflict of Interest which Occurred between him and his Trial Attorney.

Intersimone respectfully submits this issue at this time so as to preserve it for further timely review.

CONCLUSION

For the foregoing reasons, Intersimone's convictions should be reversed and the indictment dismissed.

Most respectfully submitted,

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JURY'S VERDICT AS TO
THE CONSPIRACY COUNT

2. If you have found any of the following defendants guilty on Count One of the Indictment, what is your finding as to when each of them joined the conspiracy charged in Count One?

	Before May 1, 1971	On or after May 1, 1971
Juan Antonio Alvarez	XXX	_____
Angel Rodriguez	XXX	_____
Frank Moten	XXX	_____
Sebastian Intersimone	_____	XXX
William Hightower	XXX	_____
Sidney Foster	XXX	_____
Joseph Sampson	XXX	_____
Lois Sampson	XXX	_____
Donald O'Dood	_____	_____
Don Wilson	_____	XXX
James Laws	_____	XXX
Tommy Davis	XXX	_____
John Morris	XXX	_____
Raphael Bonilla	XXX	_____
Charles Cowpers	XXX	_____
Marion Dunmore	_____	_____
Albert Lee Jones	_____	XXX
Nelson Alvarez	_____	_____

TOTAL OF INVOICES	
LESS 7% DISCOUNT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	

THE NEW ENGLAND NATIONAL BANK
BOSTON, MASSACHUSETTS

No. 1001

PAY TO THE ORDER OF

Philadelphia Waterworks *April 12, 1900*
\$2000.00 DOLLARS

NEW ENGLAND NATIONAL BANK
BOSTON, MASSACHUSETTS

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PAY ANY BANK

19 APR

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PAY ANY BANK

19

Philadelphia Waterworks

Persons named are also real and
true, full name's or any nick names
(street names) My name John T. Brown
alias Jack Brown, Perry Dupree,
Ken Woodman, Todd Monroe.

Since on the run, I've dealt in
Cocaine real real big, but now I'm
a marked man to be hit by

Black Mafia, murder ring Chicago
N.Y. Wash, D.C. 3 or 5 or more

members of white and Cuban outfits
My connection was and is one

Tony Alvarez, 2680 - N.W. 123rd St.
Miami Fla - Phone 305-688-0658

Biggest in U.S.A. 1 Black Mafia
Leader Yvonne Chapman, Chicago

Ill. Phone - 312 - 221-0626, also
professional supplier for killers

weapon (laser light seeing through
apt houses or steel or heavy concrete
Putting victim on television dead to

Washing ton, D.C.

Investigation

Director of Federal Bureau

Mr. Clarence Kelley

3505
Wid.

11-11-74
11-11-74
11-11-74

Important

right target using a stove or
burner in street language to
burn victim, leaving no traces

The Boss and enforcer
Mr. "B." Sebastian Intersimone
Rt 1 Box A - Accord N. Y. State
PH- 914- 626- 7780 Vicious

Phone - 301
350-55

Michel (Mikie) Parker 1745
Addison Rd. South, District Hgt
Md. (Son in law) to my daughter
Jacqueline Brown Parker, Mikie
xx Cross me out of fear.

you can get taps on phone, and
get pertinent info. If I can
continue to dodge my killers
I will. but only to get O.K.

If you don't hear from me
I'm dead

201
7/25/75
7/25/75
J.T.B.
7/25/75

PH
7/25/75

PH
7/25/75